

THE HONORABLE JOHN C. COUGHENOUR

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

TIFFANY HILL, individually and on
behalf of all persons similarly situated,

Plaintiff,

v.

XEROX BUSINESS SERVICES, LLC, et
al.,

Defendants.

CASE NO. 2:12-cv-00717-JCC

**STIPULATED MOTION TO STAY
CASE DEADLINES AND TO STRIKE
TRIAL DATE**

NOTED ON MOTION CALENDAR:
April 8, 2025

Plaintiff Tiffany Hill (“Plaintiff”) and Defendants Xerox Business Services, LLC, et al. (“Defendants”) (collectively the “Parties”) jointly move the Court to stay or strike all current case deadlines and strike the trial date in this matter. In support of this Stipulated Motion, the Parties state the following:

1. With the assistance of mediator Retired Judge Paris Kallas, on April 4, 2025, the Parties reached an agreement on the materials terms of a class action settlement in this matter.

2. Because this is a class action, the settlement must be approved by the Court in accordance with Federal Rule of Civil Procedure 23(e).

3. The Parties need to memorialize their settlement in writing and prepare related documents (e.g., notices to the class).

1 4. The parties anticipate that they can negotiate, complete, and execute the
2 settlement and related documents by the first week of May 2025.

3 5. Plaintiff anticipates filing a motion for preliminary approval of the settlement
4 by mid-to-late May 2025.

5 6. The Parties have various impending pre-trial deadlines as well as deadlines set
6 in this Court's Order dated March 21, 2025 (Dkt No. 261) that address matters that are not
7 relevant to settlement and will become moot if the Court approves the settlement.

8 7. The Parties agree that staying all current deadlines and striking the trial date so
9 that the Parties and the Court can move forward in the settlement approval process will avoid
10 needless cost and burdens on the Parties and the Court. *See, e.g.*, LCR 26(f) (parties should
11 "promote the just, efficient, ... and economical determination" of actions).

12 8. For the foregoing reasons, the Parties jointly and respectfully request that the
13 Court stay all current deadlines and strike the trial date in this case.

14 IT IS SO STIPULATED THROUGH COUNSEL OF RECORD.

15 Respectfully submitted this 8th day of April 2025.

16
17 K&L GATES LLP

18 By: /s/ Patrick Madden

19 Patrick M. Madden, WSBA #21356

20 Todd L. Nunn, WSBA #23267

21 925 Fourth Avenue, Suite 2900

22 Seattle, Washington 98104-1158

23 Tel: +1 206 370 6795

24 Fax: +1 206 623 7022

25 Email: patrick.madden@klgates.com

26 todd.nunn@klgates.com

Attorneys for Defendants

1 TERRELL MARSHALL LAW GROUP PLLC

2 By: /s/ Toby J. Marshall

3 Toby J. Marshall, WSBA #32726
4 Email: tmarshall@terrellmarshall.com
5 936 North 34th Street, Suite 300
6 Seattle, Washington 98103
7 Telephone: (206) 816-6603
8 Facsimile: (206) 319-5450

9 Daniel F. Johnson, WSBA #27848
10 Email: djohnson@bjtlegal.com
11 BRESKIN JOHNSON & TOWNSEND, PLLC
12 1000 Second Avenue, Suite 3670
13 Seattle, Washington 98104
14 Telephone: (206) 652-8660
15 Facsimile: (206) 652-8290

16 *Attorneys for Plaintiff*

17 **~~PROPOSED~~ ORDER**

18 The Parties have informed the Court that they have reached an agreement on the
19 materials terms of a class action settlement in this matter. The Parties have thus jointly moved
20 the Court for an Order staying all current deadlines and striking the trial date in this case.

21 **PURSUANT TO STIPULATION IT IS SO ORDERED.**

22 DATED this 8th day of April 2025.

23 

24 JOHN C. COUGHENOUR
25 UNITED STATES DISTRICT JUDGE
26